

# Buchanan

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June 13, 2025

Katrina L. Dunderdale, Administrative Law Judge  
Pennsylvania Public Utility Commission  
301 Fifth Avenue, Suite 220  
Pittsburgh, PA 15222  
[kunderdal@pa.gov](mailto:kunderdal@pa.gov)

Re: Joint Petition for Generic Investigation or Rulemaking Regarding “Gas-On-Gas”  
Competition Between Jurisdictional Natural Gas Distribution Companies  
Docket No. P-2011-2277868

Generic Investigation Regarding “Gas-On-Gas” Competition Between  
Jurisdictional Natural Gas Distribution Companies  
Docket No. I-2012-2320323

Dear Judge Dunderdale:

On behalf of Peoples Natural Gas Company LLC (“Peoples”), Columbia Gas of Pennsylvania, Inc. (“Columbia”), and National Fuel Gas Distribution Corporation (“NFG”), Parties in the above-captioned consolidated proceeding (the “Requesting NGDCs”), this is a request for amendment of a portion of your May 20, 2025 Prehearing Order (“May 20 Order”) that specified information natural gas distribution companies with service territories in western Pennsylvania must serve on or before July 20, 2025 in this proceeding. The May 20 Order directed that concerns with the scope of the information to be served should be brought to the attention of the Presiding Officer and active Parties by June 18, 2025. Peoples has been authorized by Columbia and NFG to file and serve this request on behalf of the Requesting NGDCs.

As was summarized in the March 28, 2025 Secretarial Letter reopening this proceeding, the Pennsylvania Public Utility Commission (“PaPUC”) noted four open issues in these dockets in its June 13, 2019, Order as follows:

1) The appropriate methodology to calculate the lowest applicable *gas-on-gas flex tariff rates* available to customers who participate in gas-on-gas competition.

(2) The uniform tariff provisions to be utilized by jurisdictional natural gas distribution companies in implementing *gas-on-gas flex rates*.

(3) The circumstances under which the extension of service to a potential gas-on-gas customers at full tariffed rates should be permitted.

(4) Whether a separate rate schedule should be established for *gas-on-gas flex rate* customers.

(Emphasis added).

The Requesting NGDCs note that questions (a), (d), and (e) in Ordering Paragraph No. 1 of the May 20 Order, appear to extend the scope of the narrow issues identified by the PaPUC in its June 13, 2019 Order. More specifically, the use of the conjunction “and/or” extends the scope of information beyond gas-on-gas flex tariff rate customers to include other customers not involved in gas on gas competition. The broader data collection the May 20 Order suggests would co-mingle gas-on-gas flex rate data with other flex data, and such comingling could impact the analysis of the data pertinent to this proceeding. Therefore, the Requesting NGDCs propose that Ordering Paragraph No. 1 of the May 20 Order be amended to reflect the following wording of questions (a), (d), and (e) that uses the conjunction “and” rather than “and/or” as follows:

- a. The number of customers currently using a Flex Rate and involved in a gas-on-gas competition program;
- d. The total dollars received for participation in the Flex Rate and gas-on-gas competition program from the customers listed in subsection (a) above, in the 2024 calendar year;
- e. The number of customers who received a Flex Rate and were included in the NGDC’s gas-on-gas competition program for the 2021 calendar year;

The Requesting NGDCs respectfully propose that a ten-day deadline be set for parties to file with the PaPUC objections to this request, with service thereof on all parties.. If there are objections filed, the Requesting NGDCs ask that a seven-day response period to objections be set.

Katrina L. Dunderdale, Administrative Law Judge

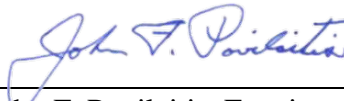
June 13, 2025

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Thank you Your Honor for your consideration of this request.

Sincerely,

BUCHANAN INGERSOLL & ROONEY PC

By:   
\_\_\_\_\_  
John F. Povilaitis, Esquire  
Counsel for Peoples Natural Gas Company  
LLC

JFP/psm

cc: Certificate of Service

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

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Dated: June 13, 2025